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JOHN F. DAVIS, CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1969

No. ~~1969~~ 107

HAZEL PALMER, ET AL, *Petitioners,*

vs.

ALLEN C. THOMPSON, MAYOR, CITY OF
JACKSON, ET AL, *Respondents.*

OBJECTIONS OF RESPONDENTS TO MOTION FOR
LEAVE TO FILE BRIEF AMICUS CURIAE

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Attorneys for Respondents.

STATE OF NEW YORK
IN SENATE
JANUARY 18, 1907.

REPORT

OF THE

COMMISSIONERS OF THE LAND OFFICE.

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ALBANY:

WILLIAM H. BROWN, COMMISSIONER.

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ALBANY: W. H. BROWN, COMMISSIONER.

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IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1969

No. 1289

HAZEL PALMER, ET AL, *Petitioners,*

vs.

ALLEN C. THOMPSON, MAYOR, CITY OF
JACKSON, ET AL, *Respondents.*

**OBJECTIONS OF RESPONDENTS TO MOTION FOR
LEAVE TO FILE BRIEF AMICUS CURIAE**

Respondents respectfully object to the motion filed herein by James Moore, C. O. Chinn, Willie Crump and Minnie McFarland for leave to file a brief as amicus curiae herein and submit the following reasons for withholding consent:

1. This is an effort to inject into this case alleged factual situations involving the towns of Greenwood, Canton, Edwards and West Point, Mississippi, which are no way involved in this case. The factual situations presented are wholly outside the record in the present case and will not be considered by this Court in the disposition of the present case. *Knetsch v. United States* (1960) 364 U.S. 361, 81 S.Ct. 132, 5 L.Ed.2d 128.

2. The motion does not state that either the facts or questions of law involved in the present case have not or will not be adequately presented by the parties.

3. Persons should not be permitted to appear amicus curiae who are obviously partisan. 3 *C.J.S.*, Amicus Curiae,

Sec. 2(c), p. 1047; *Universal Oil Products Co. v. Root Refining Co.*, 66 S.Ct. 1176, 328 U.S. 575, 90 L.Ed. 1447.

For the above reasons we respectfully submit that the motion for leave to file brief amicus curiae should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned of counsel certifies that a true and correct copy of the foregoing Objections of Respondents to Motion for Leave to File Brief Amicus Curiae was this day mailed by United States mail, postage prepaid, to the following:

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This 7th day of April, 1970.

Thos. H. Watkins
Thos. H. Watkins,
Of Counsel for Respondents.